

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

| | | |
|-----------------------------|---|----------------------------|
| UNITED STATES OF AMERICA |) | |
| |) | |
| v. |) | CR. NO. 2:21-CR-49-MHT-JTA |
| |) | |
| WILLIAM LEE HOLLADAY, III, |) | |
| DEBORAH IRBY HOLLADAY, and |) | |
| WILLIAM RICHARD CARTER, JR. |) | |

**JOINT PROPOSED LOGISTICAL PLAN FOR IDENTIFICATION AND EXCHANGE
OF PROPOSED TRIAL EXHIBITS**

Comes now the United States of America, by and through Verne H. Speirs, Attorney for the United States acting under authority conferred by 28 U.S.C. § 515, along with the attorneys for Defendants William Lee Holladay, III (Trey Holladay), Deborah Irby Holladay, and William Richard Carter, Jr., and, pursuant to the Court's order of September 23, 2021, see Doc. 164, submit this proposed logistical plan for the identification and exchange of documents and other items that the parties intend to use at trial.

After conferring, the parties propose the following plan:

A. Government's Production

By no later than Wednesday, December 1, 2021, the government will provide to the attorneys for each of the above-referenced defendants, a copy of the documents and other items that the government intends to use at trial, as well as an exhibit list. Before December 1, 2021, the government will provide, on a rolling basis as they are available, copies of proposed exhibits. However, the government's production will be substantially complete by December 1, 2021. After December 1, 2021, should the government identify an additional item for use at trial, the government will promptly notify the defense attorneys of the additional item and provide a copy

of the item to the defense attorneys. Due to the voluminous nature of the items, the government will provide copies of its proposed exhibits in an electronic format.

B. Defense Production

By no later than Friday, January 7, 2021, each defendant will provide to the government copies of all items that the defendant intends to offer into evidence during his or her case-in-chief. Following January 7, 2021, should a defendant identify an additional item for use in his or her case-in-chief, the defense attorney will promptly notify the government of the additional item and provide a copy of the additional item to the government. The defendants will produce copies of their proposed exhibits in either physical or electronic format.

C. Redactions

The parties acknowledge that many of the proposed exhibits will contain: (1) financial account information; (2) personal identifying information of third parties (including personal identifying information of minors); and (3) educational records of third parties. The government is working diligently to redact such materials from the materials. However, the materials may not be fully redacted by December 1, 2021. In such case, the government will provide un-redacted copies of its proposed exhibits by December 1, 2021. Thereafter, the government will provide redacted versions as those become available.

Respectfully submitted this 20th day of October 2021.

VERNE H. SPEIRS
ATTORNEY FOR THE UNITED STATES
ACTING UNDER AUTHORITY
CONFERRED BY 28 U.S.C. § 515

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CERTIFICATE OF SERVICE

I hereby certify that on October 20, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record.

Respectfully submitted,

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